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6 Attorneys for Plaintiff  
J & J Sports Productions, Inc.

7  
8 UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
9

10 J & J Sports Productions, Inc.,

11 Plaintiff,

12 vs.

13 Kenneth James Randall, et al.

14 Defendant.  
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CASE NO. CV 08-0494 JAH (BLM)

JOINT MOTION OF DISMISSAL OF  
PLAINTIFF'S COMPLAINT  
AGAINST DEFENDANTS KENNETH  
JAMES RANDALL AND RICHARD  
ALLAN WRIGHT, individually and  
d/b/a TRIPLE CROWN PUB

17 IT IS HEREBY STIPULATED by and between Plaintiff J & J SPORTS  
18 PRODUCTIONS, INC. and Defendants KENNETH JAMES RANDALL and  
19 RICHARD ALLAN WRIGHT, individually and d/b/a Triple Crown Pub, that the  
20 above-entitled action is hereby dismissed **without prejudice** against KENNETH  
21 JAMES RANDALL and RICHARD ALLAN WRIGHT, individually and d/b/a Triple  
22 Crown Pub to the Court's jurisdiction to enforce the settlement agreement reached  
23 between the Parties.  
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1 **IT IS FURTHER STIPULATED** that provided no Party referenced above has  
2 filed a motion to reopen this action by July 16, 2008, this Court shall *not* have  
3 jurisdiction to set aside the dismissal and the dismissal shall be deemed to be **with**  
4 **prejudice**.

5 This dismissal is made pursuant to Federal Rules of Civil Procedure 41(a)(1).  
6 Each Party referenced-above shall bear its own attorneys' fees and costs.  
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9  
10 Dated: June 19, 2008

  
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**LAW OFFICES OF THOMAS P. RILEY, P.C.**

11 By: Thomas P. Riley  
12 Attorneys for Plaintiff  
13 J & J SPORTS PRODUCTIONS, INC.

14  
15  
16 Dated: June 24, 2008

  
\_\_\_\_\_  
**GARY NELSON, ATTORNEY AT LAW**

17 By: Gary Nelson  
18 Attorneys for Defendants  
19 KENNETH JAMES RANDALL and  
20 RICHARD ALLAN WRIGHT, individually and d/b/a  
21 TRIPLE CROWN PUB

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**PROOF OF SERVICE (SERVICE BY FIRST CLASS MAIL)**

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is First Library Square, 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On June 19, 2008, I served:

**JOINT MOTION OF DISMISSAL OF PLAINTIFF'S COMPLAINT  
AGAINST DEFENDANTS KENNETH JAMES RANDALL AND  
RICHARD ALLAN WRIGHT, individually and d/b/a TRIPLE CROWN  
PUB**

On all parties in said cause by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Mr. Gary Nelson, Esquire  
GARY NELSON, ATTORNEY AT LAW  
121 Broadway, Suite 250  
San Diego, CA 92101

Attorneys for Defendants

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on June 19, 2008, at South Pasadena, California.

Dated: June 19, 2008

  
MICHELLE FERREIRA